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September 26, 2022

BY ECF AND E-MAIL

The Honorable Paul A. Engelmayer
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

Re: *United States v. Sekou Simpson*, 21 Cr. 499 (PAE)

Dear Judge Engelmayer:

I represent Sekou Simpson in the above-referenced matter. Mr. Simpson is currently scheduled to be sentenced on October 13, 2022. The purpose of this letter is to respectfully request that Mr. Simpson's sentencing be adjourned approximately 85 days to January 6, 2023.

I represent a defendant proceeding to trial in the matter of *United States v. Jatiek Smith*, 22 Cr. 352. During a September 13, 2022 conference, the trial date of this multi-defendant racketeering matter was advanced from May 1, 2023, to November 28, 2022. The case involves multiple racketeering acts in violation of at least ten federal statutes. The discovery in the matter is voluminous – approaching 2 terabytes of electronically stored information, with at least one additional large disclosure to come – and the issues are increasingly complex. Indeed, the government has indicated its intent to file a superseding indictment alleging additional charges, including weapons violations, and estimates at least a three-week trial. Accordingly, the matter requires extensive pretrial preparation in a short time. An adjournment of Mr. Simpson's sentencing to January 6, 2023, would permit counsel to complete the trial and devote greater attention to his representation.

This is Mr. Simpson's third request for adjournment of sentencing and the government consents to this request. Accordingly, it is respectfully requested that Mr. Simpson's sentencing be adjourned to January 6, 2023, or a date thereafter convenient to the Court. The Court's time and consideration of this matter are greatly appreciated.


Respectfully submitted,



Michael D. Bradley

DENIED. Sentencing has already been adjourned twice and a request for an 85-day third adjournment is excessive. The Clerk of Court is requested to terminate the motion at Dkt. No. 207.

SO ORDERED. 9/27/2022



PAUL A. ENGLMAYER
United States District Judge